

139 E. WARM SPRINGS RD.
LAS VEGAS, NEVADA 89119
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BRANDON | SMERBER
LAW FIRM

1 **SAO**
2 **LEW BRANDON, JR., ESQ.**
3 Nevada Bar No. 5880
4 **JEFFREY J. ORR, ESQ.**
5 Nevada Bar No. 7854
6 **BRANDON | SMERBER LAW FIRM**
7 139 East Warm Springs Road
8 Las Vegas, Nevada 89119
9 (702) 380-0007
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11 l.brandon@bsnv.law
12 j.orr@bsnv.law
13 *Attorneys for Defendant,*
14 *99 CENTS ONLY STORES LLC*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SILVIA GUERRERO-RAMIREZ, individually,
13 Plaintiff,

14 v.

15 99 CENTS ONLY STORES LLC; and DOES
16 1-10; and DOE EMPLOYEES 11-20; and ROE
17 BUSINESS ENTITIES 21-30,

18 Defendants.

CASE NO.: 2:22-cv-01688-GMN-VCF

**SUBMITTED IN COMPLIANCE
WITH LR 26-3**

19 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (SECOND**
20 **REQUEST)**

21 IT IS HEREBY STIPULATED AND AGREED TO by Defendant, 99 CENTS ONLY
22 STORES, LLC, by and through its undersigned attorneys, LEW BRANDON, JR., ESQ., and
23 JEFFREY J. ORR, ESQ., of BRANDON | SMERBER LAW FIRM, and Plaintiff, SILVIA
24 GUERREO-RAMIREZ, by and through her attorneys, JASON W. BARUS, ESQ. and ERIK A.
25 BROMSON, ESQ. of LAW OFFICE OF JASON W. BARRUS, that the discovery deadlines shall
26 be extended pursuant to LR 26-3.

27
28 **I. Discovery Conducted to Date (LR 26-4(a)):**

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The parties have prepared their initial early case conference lists of witnesses and documents. Written discovery has been propounded by both parties. Both parties have responded to discovery requests. Plaintiff has provided medical authorizations to the Defendant in order to obtain copies of medical records. Plaintiff's deposition is complete. The parties have disclosed experts.

II. Discovery to Be Conducted (LR 26-4(b)):

1. Expert depositions;
2. Medical provider depositions.

III. The Reasons the Above Discovery Cannot Be Done Within The Existing Discovery Time Limits (LR 26-4(c)):

The parties need additional time to complete the expert depositions due to the availability of the experts..

IV. Current Discovery Deadlines

- | | |
|------------------------------------|-----------------------|
| 1. Amend Pleadings/Add Parties: | Closed. |
| 2. Disclosure of Experts: | Closed. |
| 3. Disclosure of Rebuttal Experts: | Closed. |
| 4. Discovery Cut-Off: | October 9, 2023; |
| 5. Dispositive Motions deadline: | November 7, 2023; and |
| 6. Joint Pre-Trial order | December 7, 2023. |

V. Proposed Schedule For Completing All Remaining Discovery (LR 26-4(d)):

The parties propose the following extended dates:

- | | |
|------------------------------------|------------------------|
| 1. Amend Pleadings/Add Parties: | Closed. |
| 2. Disclosure of Experts: | Closed |
| 3. Disclosure of Rebuttal Experts: | Closed |
| 4. Discovery Cut-Off: | November 17, 2023; |
| 5. Dispositive Motions deadline: | December 18, 2023; and |
| 6. Joint Pre-Trial order | January 18, 2024 |

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1 DATED this 18th day of September 2023.

2
3 **LAW OFFICE OF JASON W. BARRUS**

4
5 /s/ Erik Bromson, Esq.

6 **JASON W. BARRUS, ESQ.**

7 Nevada Bar No. 12697

8 **ERIK A. BROMSON, ESQ.**

9 Nevada Bar No. 9986

10 1601 E. Charleston Blvd.

11 Las Vegas, Nevada 89104

12 *Attorneys for Plaintiff,*

13 *SILVIA GUERREO-RAMIREZ*

DATED this 18th day of September 2023.

BRANDON | SMERBER LAW FIRM

/s/ Jeffrey J. Orr, Esq.

LEW BRANDON, JR., ESQ.

Nevada Bar No. 5880

JEFFREY J. ORR, ESQ.

Nevada Bar No. 7854

139 East Warm Springs Road

Las Vegas, Nevada 89119

Attorneys for Defendant,

99 CENTS ONLY STORES LLC

SILVIA GUERRERO-RAMIREZ v. 99 CENTS ONLY STORES LLC
CASE NO. 2:22-cv-01688-GMN-VCF

ORDER

IT IS HEREBY ORDERED that the scheduling order be amended as follows:

1. Amend Pleadings/Add Parties: Closed.
2. Disclosure of Experts: Closed.
3. Disclosure of Rebuttal Experts: Closed.
4. Discovery Cut-Off: November 17, 2023;
5. Dispositive Motions deadline: December 18, 2023; and
6. Joint Pre-Trial order January 18, 2024.

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

ORDER

IT IS SO ORDERED.

Dated this 25th day of September, 2023.



UNITED STATES MAGISTRATE JUDGE

Respectfully Submitted:
BRANDON | SMERBER LAW FIRM

/s/ Jeffrey J. Orr, Esq.
LEW BRANDON, JR., ESQ.
Nevada Bar No. 5880
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Meghan Allen

From: Erik Bromson <erik@jasonbarruslaw.com>
Sent: Monday, September 18, 2023 12:19 PM
To: Jimmy Do
Cc: Jeffrey Orr; Meghan Allen
Subject: RE: Silva Guerrero-Ramirez v 99 Cents Only Store

Counsel,

You may affix my e- signature on the SAO to Extend Discovery Date.

Erik A. Bromson, Esq.

Licensed in Nevada (#9986) and Texas (#24127465)

Law Office of Jason W. Barrus

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From: Jimmy Do <j.do@bsnv.law>
Sent: Thursday, September 14, 2023 4:17 PM
To: Erik Bromson <erik@jasonbarruslaw.com>
Cc: Jeffrey Orr <j.orr@bsnv.law>; Meghan Allen <M.Allen@bsnv.law>
Subject: Silva Guerrero-Ramirez v 99 Cents Only Store

Hi Erik,

I have attached the stip and order to move the discovery date. Please review over the document and let us know if there are anything we need to correct or if you approve the document.

Best Regards,

Jimmy Do

Paralegal

BRANDON | SMERBER LAW FIRM

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